

## **REMARKS**

### **Introductory Comments**

As a preliminary matter, Applicants thank the Examiner for providing the Office Action and the references cited therein. In the Office Action: (1) the drawings were objected to under 37 CFR 1.83(a), 37 CFR 1.84(p)(4), and 37 CFR 1.84(p)(5); the specification was objected to because of informalities; and claims 1-70 were rejected under 35 U.S.C. §103(a) as being obvious over U.S. Patent No. 6,397,191 to Notani et al. (hereinafter "Notani") in view of U.S. Patent No. 5,892,905 to Brandt et al. (hereinafter "Brandt").

Applicants have amended claims 1, 3, 5, 7, 17, 19, 21, 31, 33-35, 37, 49-51, 53, and 65 as listed above to better articulate novel aspects of the claims. Claims 40 and 56 have been amended simply to correct typographical errors. Claims 71 and 72 have been added and are directed to filtering a work list. No claims have been cancelled. The amendments to the claims are supported by the specification and do not include new subject matter. After entry of the amendments, claims 1-72 will be pending. Applicants respectfully submit that claims 1-72 as amended are in condition for allowance for at least the reasons discussed below.

### **Objections to the Drawings**

A Request for Approval of Drawing Corrections and appropriate drawing replacement sheets are being filed concurrently with this Amendment to overcome the objections to the drawings by revising Figures 3, 5, 16, and 20. Rather than revising Figure 18, Applicants have added the "222" reference number to the specification, as indicated above in the Amendments to the Specification, to bring the specification into line with the drawings. Based on the replacement sheets and the Request for Drawings Corrections, it is respectfully suggested that Applicants have overcome the objections to the drawings.

### **Objections to the Specification**

The specification has been amended as listed above to overcome the Examiner's objections to the specification. No new subject matter has been added. Applicants have reviewed the specification to identify other errors for correction, and any identified errors have been corrected in the above-listed amendments to the specification. Applicants respectfully submit that the amendments to the specification overcome each objection to the specification presented in the Office Action.

**Rejection of claims 1-70 under 35 U.S.C. §103(a)**

On page 4 of the Office Action, the Examiner rejected claims 1-70 under 35 U.S.C. §103(a) as being obvious over Notani in view of Brandt. However, the Office Action fails to establish a *prima facie* case of obviousness against currently pending claims 1-72. A *prima facie* case of obviousness requires: (1) a suggestion or motivation to modify or combine the reference teachings; (2) a reasonable expectation of success; and (3) a teaching or suggestion in the prior art references for all of the claim limitations (MPEP 2143). The Office Action does not satisfy all of these requirements.

**A. Independent Claim 31**

The combination of Notani and Brandt suggested by the Examiner does not teach every claim limitation of amended claim 31. The Examiner admits on page 5 of the Office Action that Notani does not teach the claim limitation of interfacing at least one second workflow platform-independent object with the at least one first workflow platform dependent object (independent claim 31). The Examiner then asserts that Brandt teaches this limitation. Applicants have amended independent claim 31 to further articulate at least some of the novel aspects related to the claim limitation of interfacing a platform independent object and a platform dependent object. Claim 31 now recites in part:

pointing at least one first workflow platform-dependent object to access the workflow functionality, wherein the at least one first workflow platform-dependent object is customized for the workflow management system;

interfacing at least one second workflow platform independent object with the at least one first workflow platform dependent object, wherein the at least one second workflow platform independent object is configured to provide input data received from the client server to the at least one first workflow platform dependent object and to receive output data provided by the workflow management system from the at least one first workflow platform dependent object;

(with amendments emphasized). In particular, the amendments to claim 31 further emphasize the claim limitation of interfacing a platform independent object with a platform dependent object that is customized for a workflow management system. The step of interfacing provides for data to be passed between the platform independent and platform dependent objects. Applicants respectfully submit that these limitations are not taught in the prior art of record. For example, it appears that the Examiner relies on the HTML input variables or templates taught by Brandt to reject the claim limitation of interfacing a platform independent object with a platform dependent object (Office Action, page 5). However, Brandt's teaching of HTML variables and templates teaches away from this claim limitation. Brandt teaches

the use of standardized non-proprietary HTML variables because they are not dependent on a platform and allow a web browser to communicate with multiple different software applications (see col. 3, line 56 – col. 4, line 7). Thus, Brandt's system falls under the prior art described in the Background section of the specification because Brandt's system does not provide a user with the full functionality of a workflow management system via a web browser (see page 3, lines 10-14 of the specification).

Moreover, the HTML variables taught by Brandt are not objects as claimed when understood in light of the specification. In the field of computer programming, the term "object" is often understood as "an independent piece of computer code with its data."<sup>1</sup> In object-oriented programming, "object" is generally understood as "a computational grouping of operations and data into a modular unit."<sup>2</sup> Brandt fails to teach any such object. In contrast, Brandt teaches providing web-based access to software application data by using HTML templates with properly defined variables (see col. 15, lines 40-44). The computer system disclosed in Brandt parses an HTML template identified by a web client to locate variables in the template. Values for the located variables are then requested from the software application, which provides these values. The values are then inserted into the HTML pages for output to the web client (see col. 15, lines 25-40). The use of HTML variables rather than objects does not provide a user with the full functionality of the workflow management system. Brandt does not even mention the word "object," much less the step of interfacing a platform-independent object with a platform-dependent object.

The combination of Notani and Brandt suggested by the Examiner also fails to teach other claim limitations recited in claim 31. Claim 31 further recites in part:

calling at least one server program with the at least one control page  
which thereby invokes at least one of the first workflow platform-dependent  
object and the at least one second workflow platform-independent object;  
wherein, when the functionality of the workflow management system  
is to be accessed via the set of predefined protocol user interface pages, the at  
least one control page calls the at least one server program which, in turn,  
invokes at least one of the first and second objects to promote data translation  
and exchange between the client program and the workflow management  
system.

(Emphasis added.) On page 5 of the Office Action, the Examiner relies on Notani's teaching of executing objects at nodes to which the objects have been distributed (col. 2, lines 25-39) to reject these claim limitations. However, Notani does not teach every element of the above-

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<sup>1</sup> See <http://www.cs.cornell.edu/wya/DigLib/MS1999/glossary.html>

<sup>2</sup> See <http://java.sun.com/j2se/1.3/docs/guide/idl/jidlGlossary.html>

cited limitations. The Examiner admits on page 5 of the Office Action that Notani does not disclose predefined protocol user interface pages. Notani also fails to teach the claim limitation of “calling at least one server program with the at least one control page....”

Further, Notani does not teach the claim limitation of accessing the functionality of the workflow management system via the set of predefined protocol user interface pages. In contrast to providing users access to a workflow management system, Notani teaches a workflow that is distributed for execution on multiple engines (col. 12, lines 32-42). Software processes are distributed to nodes to offload processing demands from a central hub processor while expanding the domain of collaboration for decision making (see col. 16, lines 7-10). This distribution of processing loads for collaboration is unrelated to providing access to the functionality of a workflow management system with a control page by invoking at least one of the first and second claimed objects. Since Notani and Brandt, taken alone or in any reasonable combination, do not disclose or suggest all subject matter recited in amended claim 31, the Examiner has not established a *prima facie* case of obviousness. Applicants respectfully submit that amended claim 31 and all of its dependent claims (claims 32-64) are in condition for allowance.

#### **B. Independent Claim 1**

On page 11 of the Office Action, the Examiner rejected independent claim 1 based on the same rejections used to reject claim 31. Similar to amended claim 31, Applicants have amended independent claim 1 to further articulate some of the novel aspects related to interfacing a platform independent object and a platform dependent object. Claim 1 now recites in part:

at least one first workflow platform-dependent object for accessing the workflow functionality, wherein the at least one first workflow platform-dependent object is customized for the workflow management system;  
at least one second workflow platform-independent object for providing input data received from the client server to the at least one first workflow platform dependent object;

(with amendments emphasized). As discussed above in relation to the amendments to claim 31, the amendments to claim 1 further emphasize the claim limitation of interfacing a platform independent object with a platform dependent object that is customized for a workflow management system. The limitation of interfacing provides for data to be passed between the platform independent and platform dependent objects. Also similar to claim 31, claim 1 recites the claim limitations of at least one server program callable by the at least one

control page and adapted to invoke at least one of the first workflow platform-dependent object and the at least one second workflow platform-independent object. Accordingly, all of the arguments presented above for the patentability of claim 31 apply equally for claim 1. Applicants respectfully submit that amended claim 1 and all of its dependent claims (claims 2-30) are in condition for allowance.

**C. Separate Patentability of Claims Dependent from both Claims 1 and 31**

In view of the patentability of both independent claims 1 and 31, it is respectfully submitted that the claims that depend from the two independent claims, namely claims 2-30 from claim 1 and claims 32-64 from claim 31, are in condition for allowance. However, the dependent claims include limitations that also distinguish them from the prior art of record. A discussion of representative examples of such distinctions follows.

**1. Claims 3, 17, 33, and 49**

In regards to claim 33, the Examiner interprets a software application's processing of a user's request to completion disclosed in Brandt to read on the claim limitation of a "record lock" (page 6 of the Office Action). Applicants respectfully disagree with this interpretation of Brandt. The processing of a software application to completion is entirely different from a "record lock" as recited in the claims when understood in light of the specification. The claim limitation of a "record lock" refers to permitting exclusive access by a user to perform work on a particular task in the workflow management system. This limitation is explicitly recited in claims 3 and 17, and has been added to claims 33 and 49 by amendment. Further, claims 3, 17, 33, and 49 have been amended to better articulate novel aspects of the record lock features by reciting the limitation of "checking out the task to the user for the user to work on the task." Applicants respectfully assert that the completion of a software process taught in Brandt does not read on the amended claim limitations.

Moreover, inasmuch as the Examiner interprets the identifier taught by Brandt to read on the claim limitation of the work item identification (page 6 of the Office Action), the Office Action fails to establish a *prima facie* case of obviousness against claims 3, 17, 33, and 49. The identifier taught by Brandt is different from the work item identification recited in the claims. Brandt teaches attaching an identifier to each communication or conversation between a specific browser and a software application (see col. 16, lines 62-64). The identifier allows the gateway device of Brandt to disconnect from the software application and then reconnect at a later time to resume a communication (see col. 17, lines 5-45). In contrast, the work item identification recited in claims 3, 17, 33, and 49 is used to identify a

particular task in the workflow management system that is to be checked out to a particular user. The claimed task, as understood in light of Applicants' specification, is entirely different from a conversation between a web browser and a software interface as taught by Brandt. Thus, a Brandt-styled identifier is unrelated to Applicants' claimed identifier. Since Notani and Brandt, taken alone or in any reasonable combination, do not disclose or suggest all subject matter recited in amended claims 3, 17, 33, and 49, the Examiner has not established a *prima facie* case of obviousness. Applicants respectfully submit that dependent claims 3, 17, 33, 49, and the claims dependent on them (claims 4-16, 18, 34-38, and 50) are in condition for allowance independently of their allowability based on their dependence from independent claims 1 or 31.

## **2. Claims 4, 18, 34, and 50**

With respect to claim 34, it appears that the Office Action relies on Brandt's teaching of a software application generating values for variables to reject the claim limitation of performing work on the task (page 6 of the Office Action). Applicants have amended claims 34 and 50 to more clearly articulate the claim limitation of presenting a predefined protocol page for performing work on the task. Amended claims 34 and 50 recite, "issuing a redirection command to cause a predefined protocol page represented by the target user interface address to be presented to a user for performing work on the task identified by the work item identification." Applicants respectfully submit that the cited references do not teach these limitations of amended claims 34 and 50 **BECAUSE.....** Claims 4 and 18 recite similar limitations of navigating the user to the predefined protocol page for performing work on the task. Since the prior art of record does not teach every limitation of claims 4, 18, 34, and 50, the Office Action fails to establish a *prima facie* case of obviousness. Therefore, dependent claims 4, 18, 34, 50, and the claims dependent on them (claims 5-16 and 35-48) are in condition for allowance independently of their allowability based on their dependence from independent claims 1 or 31.

## **3. Claims 5, 19, 35, and 51**

Applicants have amended claims 5, 19, 35, and 51 to further articulate several of their novel aspects. Amended claims 5, 19, 35, and 51 recite the claim limitation of releasing a record lock on a task to terminate any exclusive access by a user to work on the task. The completion of a software process as taught in Brandt and relied on by the Examiner is entirely unrelated to releasing a record lock as claimed **BECAUSE.....** Similarly, Brandt's teaching of a disconnect function that suspends processing while waiting for user input is entirely different from releasing a record lock as claimed **BECAUSE.....** Therefore,

the Office Action fails to establish a *prima facie* case of obviousness, and dependent claims 5, 19, 35, 51, as well as the claims that depend from them (claims 6-16, 20, 36-48, and 52) are in condition for allowance independently of their allowability based on their dependence from claims 1 or 31.

**4. Claims 7, 21, 37, and 53**

In regards to claim 37, the Examiner appears to be interpreting a subsequent HTML page taught in Brandt col. 16, lines 7-15 to read on the claim limitation of a new instance of a process template. However, a process template as claimed when read in light of the specification is entirely different from an HTML page. Applicants have amended claims 7, 21, 37, and 53 to further articulate novel aspects of the process template. These claims, as amended, recite the claim limitation of a new instance of a process template defining a specific set of tasks. Applicants respectfully submit that Brandt does not teach this limitation. Therefore, dependent claims 7, 21, 37, and 53 as amended, as well as their dependent claims (claims 8-16, 22, 38-48, and 54), are in condition for allowance independently of their allowability based on their dependence from claims 1 or 31.

**5. Claims 15, 29, 47, and 63**

With respect to claim 47, on pages 8-9 of the Office Action the Examiner interprets a reservation confirmation template of Brandt to read on the notifications page recited in the claim. Even if this assertion did read on the claimed notification page, Brandt does not teach the limitations of claim 47 as a whole. Claim 47, as well as claims 15, 29, and 63 recite the limitation of the control page comprising a page selected from a group consisting of a worklist page, a process instance page, a process template page, a work item control page, a filter control page, and a notifications page. Other than the notifications page, the Office Action fails to cite any support for the pages in the group as claimed. Therefore, Applicants respectfully assert that claims 15, 29, 47, and 63 are patentable independently of their patentability based on any intervening base claims.

**6. New Dependent Claims 71-72**

In regards to new claims 71 and 72, where claim 71 depends from claim 1 and claim 72 depends from claim 31, Applicants respectfully submit that the prior art of record does not teach the “filter” limitations recited in the claims. It is thus respectfully submitted that claims 71 and 72 are in condition for allowance.

**D. Independent Claim 65**

On pages 9-10 of the Office Action, the Examiner relies on Brandt’s teachings of

users accessing a car rental application to rent a car to reject independent claim 65.

Applicants have amended claim 65 to further articulate some of its novel aspects. Amended claim 65 includes the limitation of a predefined protocol process activity page relating to a process, wherein the process corresponds with a function of the workflow management system. The claimed process is entirely different from that exemplified by Brandt's car rental application. And, even viewing the process of the car rental application in the light most favorable to the Examiner's position, it still does not disclose or suggest Applicants' claimed methodology BECAUSE...... Therefore, Applicants respectfully submit that Brandt does not disclose or suggest subject matter recited in claim 65 and accordingly both it and its dependent claims (claims 66-70) are in condition for allowance.

Claim 65 also recites further patentable subject matter. For example, claim 65 includes the following claim limitations: (1) creating a process directory beneath a predefined interface root directory path for the process and named for the unique identifier thereof; (2) locating a predefined protocol user interface page in the created directory within the predefined interface root directory; and (3) the predefined protocol process activity page and the predefined protocol user interface page can be automatically located by the interface by only knowing the process unique identifier or the task unique identifier, respectively. On pages 9-10 of the Office Action the Examiner interprets the activity programs of Brandt to be separate software modules that perform a specific task. The Examiner then relies on this teaching to reject the claim limitations listed above. However, the individual software modules of Brandt do not read on these claim limitations because Brandt does not teach a convention for naming or organizing the software modules according to a unique identifier, much less a convention for naming and organizing process directories and activity and user interface pages associated with a process. Brandt also fails to teach automatically locating a page by knowing only a unique process or task identifier. Since Brandt does not teach each and every claim limitation recited in claim 65, the Office Action fails to establish a *prima facie* case of obviousness. Applicants respectfully submit that claim 65 and its dependent claims (claims 66-70) are in condition for allowance.




**CONCLUSION**

All objections and rejections have been addressed. In view of the above, each of the presently pending claims in this application is believed to be in condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue. It is believed that any fees associated with the filing of this paper are identified in an accompanying transmittal. However, if any additional fees are required, they may be charged to Deposit Account 07-2347. To the extent necessary a petition for extension of time under 37 C.F.R. § 1.136(a) is hereby made, the fee for which should be charged to the aforementioned deposit account.

Respectfully submitted,

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